

EXHIBIT B

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GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL
CATALDO, EMIR GOENAGA, JULIAN
SANTIAGO, HAROLD NYANJOM,
KELLIE NYANJOM, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER DENYING
PLAINTIFFS' REQUEST FOR GOOGLE
TO SEARCH ADDITIONAL
CUSTODIANS' ESI**

The Honorable Alex G. Tse
Courtroom A – 15th Floor
Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request for Google to search additional custodians' ESI ("Custodian Joint Letter Brief").

Having considered the Custodian Joint Letter Brief, the Court DENIES Plaintiffs' request for Google to search additional custodians' ESI without prejudice.

1 The parties shall proceed with discovery of the three agreed-upon Google custodians' ESI. Plaintiffs
2 shall evaluate Google's production of custodial ESI from those custodians, and then meet and confer with
3 Google regarding any further custodians Plaintiffs believe are justified in this case. Should the parties be
4 unable to reach agreement on the scope of custodial ESI discovery at that juncture, the parties may bring the
5 dispute to the Court in a joint letter brief.

6 **IT IS SO ORDERED.**

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8 DATED: _____

9 Honorable Alex G. Tse
10 United States Magistrate Judge
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